

EAST PALO ALTO PLANT

TEL. 415.324.5800

June 18, 1992

Monica Gan
Cal-EPA
Department of Toxic Substances
Control
700 Heinz Avenue, Bldg. F.
Berkeley, CA 94710



Re: Bay Area Drum Company

Dear Ms. Gan:

This letter is in response to your letter to me dated May 21, 1992 which requested information regarding the Bay Area Drum Company ("BADC"). In particular, your letter requested information regarding the number and type of drums that Zoecon Corporation may have sent to BADC between 1948 and 1987. Your letter also stated that this information was being requested by the Department of Toxic Substances Control ("DTSC") under specific provisions of the California Health and Safety Code.

In response, please be advised that Zoecon Corporation was purchased by Sandoz, Inc. in 1984 and that the Chemical Division of Zoecon was merged into Sandoz Crop Protection Corporation in 1986. Sandoz Crop Protection Corporation also changed its name to Sandoz Agro, Inc. in 1991. Because of these corporation changes, Sandoz Agro received your request for information and is submitting this response.

In preparing the following response, Sandoz Agro reviewed purchasing and accounting records for the period 1972 through 1987, and chemical use records for the same period. This period was selected for review because Zoecon did not begin operation of its Chemical Division until June or July 1972. Although Sandoz Agro believes that it has located all records relating to BADC, it is continuing its search for additional records. If additional documents are located, Sandoz Agro will supplement this response in the future.

A review of the available records indicates that Zoecon Corporation sent a relatively limited number of used 55 gallon

Monica Gan
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Page 2

steel drums to BADC between 1980 and 1982 for reconditioning. In addition, Zoecon also appears to have purchased reconditioned 55 gallon steel drums from BADC in 1980 and 1981. Interviews with present employees who were also employed by Zoecon indicates that only empty drums were sent to BADC for reconditioning. None of the present employees has any recollection of the specific methods used to determine residual levels in each drum. On the other hand, the relative weight and sound of the drum would have indicated whether a drum was empty or contained some residual level of material.

Based upon a review of available records it appears that Zoecon shipped the following numbers of drums to BADC for reconditioning between 1980 and 1982:

<u>Year</u>	<u>Number of Drums Sent to BADC for Reconditioning</u>
1980	78
1981	30
1982	<u>150</u>
Total	258

In addition to the above drums which were shipped by Zoecon to BADC for reconditioning, it appears that the following drums were purchased by Zoecon from BADC during the same period.

<u>Year</u>	<u>Number of Drums Purchased by Zoecon</u>
1980	20
1981	30
1982	<u>0</u>
Total	50

As mentioned above, the available records indicate that Zoecon shipped only 55 gallon steel drums to BADC for reconditioning. Based upon this information, Sandoz Agro has compiled a list of chemicals that could have been contained in drums prior to shipment to BADC for reconditioning. That list is attached as Attachment A. However, it is important to note that only residues of these substances would have been present in the drums since only empty drums were sent to BADC for reconditioning.



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The available records indicate that no drums were sent by Zoecon to BADC for disposal. It also appears that reconditioned drums would have been returned to Zoecon for further use.

Although your letter did not request copies of records, Sandoz Agro is enclosing copies of all purchase orders and invoices regarding BADC for your information. If you have any further questions, please give me a call at (415) 324-5800.

Very truly yours,

A handwritten signature in black ink that reads "T.H. Vanden Bosch".

Thomas Vanden Bosch

Enclosures

ATTACHMENT A

ZOECON CORPORATION

List of Chemicals Possibly Shipped
55 Gallon Steel Drums

1972 - 1982

CATAGORY 1. EMULSIFIERS - DETERGENTS - ANTIOXIDANTS

GAFAC PE-510

ATLOX 3404F

ATLOX 3409F

Formalin 30%

Pamolyn 100

ATLOX 775

ATLOX 3454

ATLOX 848

Igepal CO630

Igepal CO730

Igepal CO850

Tween 80 (Phosphate)

GAFAC RS-710

ATLOX 8916TF

Igepon TN74

Sponto 232T

Sponto 234T

Toximul RHF

Toximul S

Surfynol 82

Triton X-100

Blancol N
Drapex 6-8
Fluorad FC-170
Toximul 360A
Toximul 360B MF

CATAGORY 2. INSECTICIDES

Methoprene
Fluvalinate
Tricosene
Dienochlor
Kinoprene
Resmethrin 40%
Hydroprene

CATAGORY 3. SOLVENTS

Hexane
Methanol
Toluene
N-Methyl-Pyrrolidone
Isopropyl Alcohol
Methylene Chloride
Diethyl Ether
Acetone
Tetrahydrofuran
Dimethyl Formamide
Tenneco 500-100
Xylene

Mineral Spirits - odorless

n-Pentane

CATAGORY 4. REACTANTS - INORGANIC AND ORGANIC

Thionyl Chloride

Ammonia

Phosgene

Methylacetoacetate (MAA)

Sodium Methylate 25%

Tetraisopropyl Titanate

Terephthaloyl Chloride

3,4-Dichlorotrifluoromethyl-
benzene

d-Valine (amino acid)

Ethylenediamine

N-Amyl Bromide

Azobisisobutyronitrile (Vazo 64)

Benzenethiol

Triethylamine

Lutidine

Methane Sulfonyl Chloride

Propargyl Alcohol

Triethanolamine

m-Phenoxybenzaldehyde

Pyridine

N-Chlorosuccinimide

Hexanediamine

Ketoisovaleric Acid Calcium Salt
Ketoisovaleric Acid Potassium Salt
Propylene Oxide
Ammonium Thiocyanate
Dicyanodiamine (Cyanoquanidine)
P-Nitrotrifluoromethylbenzene
p-Nitrobenzoic Acid
Propylene Glycol

CATAGORY 5. pH ADJUSTMENTS, ACIDS AND BASES

Caustic 50%
Acetic Acid - Glacial
Phosphoric Acid 85%
Lactic Acid
Ammonium Hydroxide
Hydroxyacetic Acid
Potassium Hydroxide

CATAGORY 6. FOOD GRADE OR NATURAL

Methoxycitronellal
Karo Syrup
Corn Oil
Ethanol SDA #4 - 200 Proof
Oleyl Alcohol
Dihydrocitronellal
Norfox 9-5
Norda Fragrance 0270-76

CATAGORY 7. THICKENER, PLASTICIZERS

Santicizer 711 (DOP)

R-888-T (Rubber cement)

CATAGORY 8. RESIN

Indopol H-100, Polyvis
(Polybutenes)

FOR PROMPT PAYMENT OF INVOICES OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, PACKING SLIPS AND FREIGHT BILLS, AND SHIPPING CONTAINERS.

PURCHASE ORDER

ZOECON CORPORATION

1990 BAY ROAD, EAST PALO ALTO, CALIFORNIA 94303 [415] 329-1130

No. B 3927

100

PROVIDED FOR **IN CONTRACTS**

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CAPITAL EQUIPMENT DEPARTMENT NO 6

DISCUSSIONS WITH INDIVIDUAL

-2-332 (8/78)

THE AMERICAN JOURNAL OF THEOLOGY AND PHILOSOPHY

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PURCHASE ORDER

1990 BAY ROAD, EAST PALO ALTO, CALIFORNIA 94303 (415) 857-1130

**PROVIDED FOR
IN CURRENT BUDGET**

CAPITAL EQUIPMENT YES NO

Z-2-332 (976)

WHITE - RECEIVING BLUE - VENDOR GREEN - NUMERICAL YELLOW : EXPEDITE

2000

BANK DEPARTMENT

GREEN - NUMERICAL

2000

BANK DEPARTMENT

GREEN - NUMERICAL

WHITE - RECEIVING

S'COOL SCIENCE

BANK DEPARTMENT

GREEN - NUMERICAL

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FOR PROMPT PAYMENT OF INVOICES OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, PACKING SLIP AND FREIGHT BILLS, AND SHIPPING CONTAINERS.

DAY AREA DRUM CO. INC.



Drums Bought, Sold and Recconditioned

1212 THOMAS AVENUE SAN FRANCISCO, CA 94124 PHONE: (415) 822-3955

Necon 190
1910 Bay Pointe
East Bay Deltic Ch. #130.

Samuel

DATE ORDERED	DATE SHIPPED	CUSTOMER'S ORDER NO.	TERMS:
QUANTITY	DESCRIPTION		NET 30 DAYS
1-20-80		John White	
0	55 GALLON C.H. DRUMS	175	
	55 GALLON O.H. DRUMS		
	30 GALLON O.H. DRUMS		
	30 GALLON C.H. DRUMS		
	15 GALLON C.H. DRUMS		
			REC 2 1980

Ut deo dives

John C. H. Smith

4

**FOR PROMPT PAYMENT OF INVOICES OUR PURCHASE OF
NUMBER MUST APPEAR ON ALL INVOICES. PACKING S.
AND FREIGHT BILLS, AND SHIPPING CONTAINERS.**

PURCHASE ORDER

No. B-04095

ZOECON CORPORATION
1000 BAY ROAD, EAST PALO ALTO, CALIFORNIA 94303 (415) 857-1130

PROVIDED FOR
THE CONFIDENTIAL

DRIVERS NO

DEPARTMENT APPROVAL

GÖTTSCHE

7.2.332 (9/78)

GREEN - NIMBEKA

YELLOW - EXPEDITE - PINK - DEPARTMENT

G'OOD : REQUESTOR

BAV AREA DRUM CO. Inc.



Drums Bought, Sold and Reconditioned

1212 THOMAS AVENUE SAN FRANCISCO, CA 94124 PHONE: (415) 822-3955

*John L. Blake
John L. Blake
John L. Blake
John L. Blake
John L. Blake*

DATE ORDERED	DATE SHIPPED	CUSTOMER'S ORDER NO.	TERMS:
17-11-80	1-12-80	John L. Blake	NET 30 DAYS
QUANTITY	DESCRIPTION	RECEIVED BY	RECEIVED DATE
36	55 GALLON C.H. DRUMS	John L. Blake	
	30 GALLON O.H. DRUMS		
	30 GALLON C.H. DRUMS		
	15 GALLON C.H. DRUMS		

*John L. Blake
John L. Blake
John L. Blake
John L. Blake
John L. Blake*

RECEIVED BY

RECEIVED DATE

TR 0212

10017409

Zoeccon Corporation
975 California Avenue
Palo Alto, Calif. 94304

Zögern

AMOUNT
*******650.00**
CENTS

EAY AREA DRUM CO., INC.
1212 THOMAS AVENUE
SAN FRANCISCO, CA 94124

WACHOVIA BANK & TRUST COMPANY, N.A. - WINSTON-SALEM, N.C.

DRUM CO. Inc.

Diamonds Bought, Sold and Reconditioned

THOMAS AVENUE SAN FRANCISCO, CA 94114 PHONE: (415) 822-3955

601

AREA DRUM CO.



Dreams Bought, Sold and Reconditioned

1212 THOMAS AVENUE SAN FRANCISCO, CA 94124 PHONE: (415) 877-3955

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55 GALLON C.H. DRUMS

55 GALLON O.H. DRUMS

30 GALLON O.H. DRUMS

卷之三

15 GALLON C.H. DRUMS

RECEIVED BY

Frank G. Clark

FOR PROMPT PAYMENT OF INVOICES OUR PURCHASE ORDERS
NUMBER MUST APPEAR ON ALL INVOICES, PACKING SLIP,
AND FREIGHT BILLS AND SHIPPING CONTAINERS.

PURCHASE ORDER

1990 BAY ROAD EAST PALO ALTO, CALIFORNIA 94303 (415) 329-1130

ZOECON CORPORATION

No. B-634-E

VENDOR	BAY AREA DRUM CO.
ADDRESS	1212 THOMAS SAN FRANCISC.
TELEPHONE	415 822-3955
CONFIRMED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
TERMS	BY GARY Tb

DATE APRIL 16, 82

ACCOUNT CODE	DEPT EXPENSE ACCT CODE
	3110 498

DELIVERY WED 21ST OR THURS 22ND

TAXABLE	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F.O.B.	<input type="checkbox"/> SHIPPING POINT <input checked="" type="checkbox"/> DESTINATION

SPECIAL INSTRUCTIONS	
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FROM GARY WINSLOW

PROJECT DRUM RECOND.

FREIGHT CHARGES

QUANTITY	UNIT	CATALOG NUMBER	DESCRIPTION	NET PRICE	DATE RECEIVED		
					1/23	1/24	1/25
100	DRUMS		RECONDITIONING OF DRUMS ZOECON SUPPLIED	600.00	600.00		

PROVIDED FOR IN CURRENT BUDGET	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DEPARTMENT APPROVAL
CAPITAL EQUIPMENT	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	PURCHASING DEPT. APPROVAL

WHITE REFERRING ATTF VENDOR GREEN : NUMERICAL YELLOW EXPEDITE PURCHASING DEPT. APPROVAL

BLACK : REQUEST FOR PURCHASE DEPT. APPROVAL PURCHASING DEPT. APPROVAL

A DRUM CO. Inc.

Drums, Drums, Sold and Reconditioned

1227 THOMAS AVENUE SAN FRANCISCO, CA 94124

PHONE: (415) 822-3955

Beecony
1990 B
to Phil

DATE ORDERED	CUSTOMER'S ORDER NO.	TERMS
4/16/82	100	NET 30 DAYS
		PRUMS
		DRUMS
		15 GALLON DRUMS

RECEIVED BY

John J. Murphy

Frank Scott

INVOICE #	AMOUNT	NET AMOUNT	NET AMOUNT
ITEM	AMOUNT	NET ADJ.	NET ADJ.
12282	1060	32500	3110
	12982	1051	85500
			118000
			TOTAL
			118000

Zoecon Corporation 975 Califorme Avenue

ZOECON

Zoecon Corporation
975 Califorme Avenue
Palo Alto Calif. 94304

45-48
531
10014368

PAY EXACTLY
ONE HUNDRED DOLLARS AND

00 CENTS
TO THE ORDER OF
BAY AREA DRUM CO. INC.
1214 THOMAS AVENUE
SAN FRANCISCO CALIF. 94124

WACHOVIA BANK & TRUST COMPANY, N.A. - WINSTON-SALEM

INVOICE
1080

DRUM CO.



Drums Bought, Sold and Repaired

1212 THOMAS AVENUE SAN FRANCISCO CA 94124 PHONE 556-1234

SOLD TO: C.H. DRUM CO.
1911 14TH ID
PAUL AUTO, CA 94103

INVOICE DATE	DATE SHIPPED	YOUR ORDER NUMBER	DESCRIPTION	QUANTITY	PRICE	NET 30 DAYS	AMOUNT
1-22-82	1-22-82	6675	44 C4 lion C.H. Drums Black/White Recon @ 6.50	1	6.50	6.50	6.50
1-26-82			44 C4 lion C.H. Drums Black/White Recon @ 6.50	1	6.50	6.50	6.50

RECEIVED AT C.H. DRUM CO.

JAN 27 1982 FEB 9 1982

DEPT. OF ACCOUNTING

ACCOUNTING

BAK AREA DRUM



Drum Bought Sold and
Repaired

1212 THOMAS AVENUE SAN FRANCISCO CA.

Y 5
22982

DATE ORDERED	DATE SHIPPED	CUSTOMER NO.	TERMS:
1/1/68	1/1/68	1000	NET 30 DAYS

DESCRIPTION
55 GALLON C.H. DRUMS
55 GALLON O.H. DRUMS
30 GALLON O.H. DRUMS
30 GALLON C.H. DRUMS
15 GALLON C.H. DRUMS

RECEIVED BY

You

FOR PROMPT PAYMENT OF INVOICES OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, PACKING SLIPS AND FREIGHT BILLS, AND SHIPPING CONTAINERS.

PURCHASE ORDER

1990 BAY ROAD, PALO ALTO, CALIFORNIA 94303 (415) 329-1130

ZORCON CORPORATION

No. B 6416

VENDOR	Bay Area Drum Co.
ADDRESS	1212 Thomas San Francisco, CA.
PHONE	(415) 822-3055
NAME	Mary paying to
APPROVED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO BY Gary

DATE	2/2/82
DEPT.	EXPENSE ACCT
ACCOUNT CODE	3110 498

FROM	Gary
PROJECT	Reconditioning
ITEM	Drum

DELIVERY	
TAXABLE	<input type="checkbox"/> YES
F.O.B.	<input type="checkbox"/> SHIPMENT POINT
SPECIAL INSTRUCTIONS	

CONFIRMATION NEEDED	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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FREIGHT CHARGES	
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DATE RECEIVED	2/2/82
ITEM	Reconditioned
CATALOG NUMBER	Open Head
INVOICE	0983 3120

ITEM	Reconditioned
CATALOG NUMBER	Open Head
INVOICE	0983 3120

ITEM	Reconditioned
CATALOG NUMBER	Open Head
INVOICE	0983 3120

ITEM	Reconditioned
CATALOG NUMBER	Open Head
INVOICE	0983 3120

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ITEM	Reconditioned
CATALOG NUMBER	Open Head
INVOICE	0983 3120

ITEM	Reconditioned
CATALOG NUMBER	Open Head
INVOICE	0983 3120

3/76

APPROVED FOR CURRENT BUDGET YES NO

GENERAL EQUIPMENT YES NO

DEPARTMENT APPROVAL

PURCHASING DEPT. APPROVAL

John S. Hansen
John G. Morris

LANDELS,
RIPLEY &
DIAMOND

ATTORNEYS

June 16, 1992

Monica Gan
Cal-EPA
Department of Toxic Substances
Control
700 Heinz Ave., Bldg. F
Berkeley, California 94710

Re: Zoecon Corporation

Dear Ms. Gan:

This letter will confirm our telephone conversation today regarding the Department's request to Zoecon Corporation for information regarding Bay Area Drum Company. During our conversation, I requested an extension of the date for submission of a response to the Department's information request. This letter will confirm that you agreed to an extension until June 29, 1992, for submission of a response.

Thank you for your cooperation.

Very truly yours,

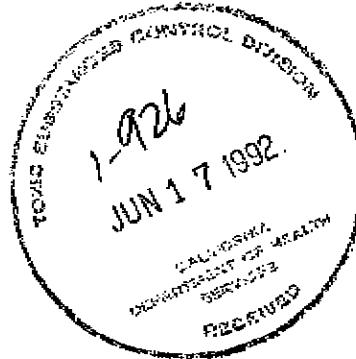
Tony Garvin
Anthony O. Garvin
AOG/r

cc: Thomas Vanden Bosch

Anthony O. Garvin
415-512-4650

Hills Plaza
350 Steuart Street
San Francisco, CA
94105-1250
Tel 415-788-5000
Fax 415-788-7550

925 L Street
Suite 950
Sacramento, CA
95814-3704
Tel 916-448-8300
Fax 916-448-4923



DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



May 21, 1992

Thomas Vandenbosch
Plant Manager
Zoecon Corporation
975 California Ave.
Palo Alto, CA 94304

Dear Mr. Vandenbosch:

This letter is to request information regarding Zoecon Corporation's past business relationship with the Bay Area Drum Company (BADC) that operated at 1212 Thomas Avenue, San Francisco. Specifically, the Department has records that indicate Zoecon's East Palo Alto facility, located at 1990 Bay Road, did business with BADC. The purpose of this letter is to request information from companies who did business with the Bay Area Drum Company to obtain information regarding the type and quantity of hazardous substances that were sent to the BADC site.

The Department is interested in the nature of transactions between your company and BADC. Please answer the following questions as specifically as possible:

- 1) The approximate number of drums shipped to BADC between 1948 through 1987.
- 2) The nature of the substances contained in subject drums
- 3) The type and capacity of each drum
- 4) The disposition of subject drums after the substances were used
- 5) The residual level in each drum after they were shipped offsite
- 6) Methods used to determine the residual levels in each drum
- 7) Were drums sent to the BADC for reconditioning?
- 8) Were drums sent to the BADC for disposal?

Please provide responses to the aforementioned questions within thirty (30) days of the date of this letter. Compliance with the information request set forth is mandatory pursuant to sections 25185.6, 25358.1 and 25358.3 of the California Health and Safety Code. Failure to respond fully and truthfully to the information request may result in enforcement action by the Department, subject to



the penalties allowed under Sections 25189, 25189.2, 25191 and 25367 of the Health and Safety Code. The penalty provided is up to \$25,000 for each violation and up to \$25,000 per day for each day that the violation continues. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties.

Please send your response to: Monica Gan
Cal-EPA, Dept. of Toxic
Substances Control
700 Heinz Ave. Bldg. F
Berkeley, CA 94710

I can be contacted at (510) 540-3767 if you have any questions regarding this matter.

Sincerely,

Monica Gan

Monica Gan,
Staff Services Analyst
Site Mitigation Branch

cc: Susan Bertken
Senior Staff Attorney
Dept. of Toxic Substances Control
P.O. Box 806,
Sacramento, CA 95814